

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	No. 08 CR 477
v.	)	
	)	HON. MILTON I. SHADUR
JONATHAN HON	)	
Defendant.	)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

NOW comes MICHAEL J. PETRO, Attorney for Defendant,  
JONATHAN HON, respectfully requests this Court for leave to  
withdraw as counsel. In support thereof, counsel states as  
follows:

1. Counsel was initially retained to represent JONATHAN HON during the investigation of this matter.
2. On June 17, 2008, JONATHAN HON was indicted. Subsequent to that event, JONATHAN HON indicated that he is unable to pay counsel for representation for post-indictment.
2. JONATHAN HON has requested that an attorney be appointed under the Criminal Justice Act.
3. JONATHAN HON has asked counsel to submit a financial affidavit [see attached] to the court in support of his request for appointment of an attorney under the Criminal Justice Act.
4. As a result of the foregoing, counsel does not have a meaningful attorney client relationship with JONATHAN HON.

5. AUSA Brian Netols was consulted who has no position.

WHEREFORE, MICHAEL J. PETRO requests that this Court allow him leave to withdraw as counsel for JONATHAN HON.

Respectfully submitted,

/s MICHAEL J. PETRO

MICHAEL J. PETRO  
ATTORNEY FOR JONATHAN HON  
53 WEST JACKSON BLVD, SUITE 324  
CHICAGO, ILLINOIS 60604  
312-913-1111

CJA 23

**FINANCIAL AFFIDAVIT**

Rev. 5/98

IN SUPPORT OF REQUEST FOR ATTORNEY, EXPERT OR OTHER COURT SERVICES WITHOUT PAYMENT OF FEE

IN THE CASE OF \_\_\_\_\_ V.S. \_\_\_\_\_  
IN THE CASE OF \_\_\_\_\_ AT \_\_\_\_\_  
FOR \_\_\_\_\_  
AT \_\_\_\_\_

LOCATION NUMBER



PERSON REPRESENTED (Show your full name)



- 1 ☐ Defendant—Adult  
 2 ☐ Defendant - Juvenile  
 3 ☐ Appellant  
 4 ☐ Probation Violator  
 5 ☐ Parole Violator  
 6 ☐ Habeas Petitioner  
 7 ☐ 2255 Petitioner  
 8 ☐ Material Witness  
 9 ☐ Other \_\_\_\_\_

DOCKET NUMBERS

Magistrate

District Court

Court of Appeals

CHARGE/OFFENSE (describe if applicable &amp; check box →)

- ☐ Felony  
☐ Misdemeanor

**ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY****EMPLOYMENT**Are you now employed? ☒ Yes ☐ No ☐ Am Self-EmployedName and address of employer: Burnhart, 3115 N. Route 23, OGDEN, UTIF YES, how much do you earn per month? \$ 60,000 per yearIF NO, give month and year of last employment  
How much did you earn per month? \$ \_\_\_\_\_If married is your Spouse employed? ☐ Yes ☒ NoIF YES, how much does your Spouse earn per month? \$ \_\_\_\_\_  
If a minor under age 21, what is your Parents or Guardian's approximate monthly income? \$ \_\_\_\_\_**ASSETS****OTHER INCOME**Have you received within the past 12 months any income from a business, profession or other form of self-employment, or in the form of rent payments, interest, dividends, retirement or annuity payments, or other sources? ☐ Yes ☒ No

RECEIVED

SOURCES

IF YES, GIVE THE AMOUNT RECEIVED &amp; IDENTIFY THE SOURCES

\$ \_\_\_\_\_

**CASH**Have you any cash on hand or money in savings or checking accounts? ☐ Yes ☒ No IF YES, state total amount \$ \_\_\_\_\_**PROPERTY**Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? ☒ Yes ☐ No

IF YES, GIVE THE VALUE AND DESCRIBE IT

VALUE

DESCRIPTION

401(K)Approx \$4,000**MARITAL STATUS**

Total No. of Dependents

List persons you actually support and your relationship to them

**DEPENDENTS**

- ☐ SINGLE  
☐ MARRIED  
☐ WIDOWED  
☒ SEPARATED OR DIVORCED

3Hillary Duncan Chance**OBLIGATIONS & DEBTS****DEBTS & MONTHLY BILLS**

(LIST ALL CREDITORS, INCLUDING BANKS, LOAN COMPANIES, CREDIT CARD COMPANIES, ETC.)

APARTMENT OR HOME:

Creditors

Total Debt

Monthly Paymt.

Hillary #80/per week

\$

\$

401(K) #150/per week

\$

\$

child support #1850/month

\$

\$

car lease #359/month

\$

\$

Dental - Bruce Daughter

\$

\$

~\$5000\$160 month

I certify under penalty of perjury that the foregoing is true and correct. Executed on (date) \_\_\_\_\_

SIGNATURE OF DEFENDANT  
(OR PERSON REPRESENTED)